

NO. 2018-1510-CCL2

**JACK WATSON**  
**Plaintiff,**

**V.**

**BASIC ENERGY SERVICES, INC.**  
**Defendant.**

§ **IN THE DISTRICT COURT**  
§  
§  
§ **\_\_\_\_\_ JUDICIAL DISTRICT**  
§  
§ **OF GREGG COUNTY, TEXAS**

**PLAINTIFF'S ORIGINAL PETITION**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COMES** Jack Watson, hereinafter called Plaintiff, complaining of and about Basic Energy Services, Inc., hereinafter called Defendant, and for cause of action shows unto the Court the following:

**DISCOVERY CONTROL PLAN LEVEL**

1. Plaintiff intends that discovery be conducted under Discovery Level 2.

**PARTIES AND SERVICE**

2. Plaintiff, Jack Watson, is an Individual who resides in Upshur, County, Texas.
3. The last three numbers of Jack Watson's driver's license number are 657.

The las three numbers of Jack Watson's social security number 691.

4. Defendant Basic Energy Services, Inc., a Corporation based in Texas, is organized under the laws of the State of Texas, and service of process on the Defendant may be effected pursuant to sections 5.201 and 5.255 of the Texas Business Organizations Code, by serving the registered agent of the corporation, CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201-3136, its registered office. Service of said Defendant as described above can be effected by certified mail, return receipt requested.



### **JURISDICTION AND VENUE**

5. The subject matter in controversy is within the jurisdictional limits of this court.

6. Plaintiff seeks:

a. only monetary relief of \$100,000 or less, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees.

7. This court has jurisdiction over the parties because Defendant is a Texas resident.

8. Venue in Gregg County is proper in this cause.

### **FACTS**

9. At all material times, Jack Watson, Plaintiff, was employed by Basic Energy Services, Inc., which was essentially from March 1, 2015 to March, 2017.

10. At all material times, Defendant was an employer within the meaning of Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 203(d).

11. Jack Watson was hired a by Defendant at the position of a field supervisor at a salary approximately \$85,000.00 per year. However, during the periods of his employment, Plaintiff, would work on average 70 hours per week. Defendants did not pay the Plaintiff any overtime, as required by the Fair Labor Standards Act ("FLSA").

### **WAGE AND HOUR CLAIM**

12. Plaintiff re-adopts each and very factual allegation as stated in paragraphs 1 through 11 of this Petition as if set out in full herein.

13. Defendant willingly and intentionally refused to properly pay Plaintiff's



True and Correct copy of original  
filed in the Gregg County District  
Clerk Office.

wages as required by the law of the United States as set forth above and remains owing Plaintiff these wages since the commencement of Plaintiff's employment with Defendant as set forth above.

WHEREBY, Plaintiff respectfully prays for the following relief against Defendant;

- A. Adjudge and decree that Defendant has violated the FLSA and has done so willfully, intentionally and with reckless disregard for Plaintiff's rights;
- B. Award Plaintiff actual damages in the amount shown to be due for unpaid overtime wages for hours worked in excess of forty (40) weekly, with interest and
- C. Award Plaintiff an equal amount in double damages/liquidated damages; and
- D. Award Plaintiff the costs of this action together with reasonable attorney's fees; and
- E. Grant Plaintiff such additional relief as the Court deems just and proper under the circumstances.

Respectfully submitted,

MATTHEW R. PATTON, IV  
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CERTIFIED COPY CERTIFICATE  
STATE OF TEXAS COUNTY OF GREGG  
I hereby certify that the above, consisting of 3  
pages, is a true and correct copy of the original  
record on file in the District Clerk's Office of  
Gregg County, Texas  
This 31 day of August, 20 18  
BARBARA DUNCAN, DISTRICT CLERK  
BY: [Signature], Deputy

BY: /s/ Matthew R. Patton, IV  
Texas Bar No. 24002736  
Email: matthew@matthewpattonlaw.com  
Attorney for Plaintiff Jack Watson